

EXHIBIT 4

Kontul, Justin J.

From: Daniel V. Gsovski <DGsovski@herzfeld-rubin.com>
Sent: Wednesday, January 06, 2016 4:32 PM
To: Kontul, Justin J.; 'klindsay'; 'philip@lowcountrybankruptcy.com'; 'rcorley@islcl.net'
Cc: Arnold, Roy W.
Subject: RE: Pinks - Production of Exemplar Notices of Repossession - CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

Justin:

Thank you for the additional exemplars of Notices of Disposition (M&T0001886-1894) as per our agreement. Kindly advise if you will provide the answer to the followup request below without the need for a formal discovery request.

"Provide the total number of private sales of consumer goods collateral by defendant or on defendant's behalf which were preceded by a Notice of Disposition to a consumer obligor in the form of M&T0001093-94."

In the meantime, we continue to await advice by as early as possible tomorrow as to either a) M&T's intention to comply with or resist the additional supplementary discovery served December 22, or failing that, b) agreement to seek adjournment of Monday's scheduled conference with the Court as proposed in my e-mail of yesterday to Roy.

Dan

Daniel V. Gsovski
Herzfeld & Rubin, P.C.
125 Broad Street
New York, New York 10004
dgsovski@herzfeld-rubin.com
Telephone: (212) 471-8512
Mobile: (917) 640-6194
Fax: (212) 344-3333

HERZFELD &
RUBIN, P.C.
ATTORNEYS AT LAW

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From: Kontul, Justin J [<mailto:JKontul@ReedSmith.com>]

Sent: Tuesday, January 05, 2016 10:46 PM

To: Daniel V. Gsovski; 'klindsay'; 'philip@lowcountrybankruptcy.com'; 'rcorley@islc.net'

Cc: Arnold, Roy W.

Subject: Pinks - Production of Exemplar Notices of Repossession - CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

Counsel:

Per your December 22, 2015 request and in the interest of cooperation in discovery, attached please find exemplar notices of repossession, other than Exhibit B to the Declaration of Michael P. Ryan dated February 12, 2015, sent by M&T Bank ("M&T") after a customer defaulted and M&T repossessed his/her consumer goods collateral after June 24, 2015 in the states for which M&T provided information in its Supplemental Answer to Interrogatory No. 8 of Plaintiff's First Set of Interrogatories. Each exemplar indicates in which state(s) and during what time period the particular notice was used.

M&T is making the attached production subject to and without waiver of its objections to Plaintiff's First Requests for Production of Documents and First Set of Interrogatories, and subject to the Protective Order entered by the Court. The documents have been marked as M&T0001086-M&T0001094 for identification purposes and have been marked as CONFIDENTIAL pursuant to the Protective Order.

Regards,
Justin

Justin J. Kontul
jkontul@reedsmith.com
+1 412 288 3098

Reed Smith LLP
Reed Smith Centre
225 Fifth Avenue
Pittsburgh, PA 15222-2716
T: +1 412 288 3131
F: +1 412 288 3063
reedsmith.com

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